

THADDEUS FREEMAN
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I. Overview of Individual and Class Allegations

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

II. Statement of Facts

For the past seven years I have applied repeatedly to AKSteel. My most recent application was in around April 2002. Having found out about the position openings by word-of-mouth, I went down to the employment office to obtain an application. Each time, I applied for a General Laborer position, a job which requires general skills such as ability to operate basic tools and work on an assembly line. Because I have more than thirty years of continuous work experience in the grocery business cutting meat and on the assembly line in factories, I thought that the position corresponded well to my qualifications. In addition, I have a good work record, am dependable, never late to work, and have never been without a job or laid off. Furthermore, I have no felony convictions and am drug-free. After every application but one, however, I heard nothing back from AKSteel. In 1999, after years of trying to get hired, I decided to try leaving blank the question that asked me to specify my racial identity. After I submitted this application, AKSteel contacted me and expressed their interest in having me come in to take a test, which I did. When I went to the employment office to find out how I did on the test, the receptionist took my name and I was told, "We'll have somebody get back to you," but I never heard from them again. On all subsequent applications, I filled in my race, African-American, and received no acknowledgment of receipt of my application materials, was not scheduled to interview or test, and was not notified of rejection. I am currently employed by Kroger, where I am a Meat Manager.

III. Statement of Discrimination

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

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I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

IV. Statement of Classwide Discrimination on the Basis of Race

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), et seq.

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 6-11-02

Thaddus A. Green



Charging Party (signature)